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Attorneys for Defendant Jeffrey Hansen, M.D.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

AUSTIN W. DUROSE, BY AND THROUGH)	Cause No. 13-CV-216-S
HIS NEXT FRIENDS AND NATURAL)	
PARENTS, WILLIAM K. AND MINDY E.)	
DUROSE, WILLIAM K. DUROSE, AND)	
MINDY E. DUROSE,)	
)	
Plaintiffs,)	
)	DEFENDANT JEFFREY
vs.)	HANSEN'S LISTING OF
)	OTHER WITNESSES
POWELL VALLEY HEALTHCARE, INC.;)	
POWELL HOSPITAL DISTRICT NO. 1;)	
POWELL VALLEY HOSPITAL; JEFFREY)	
HANSEN, M.D.; AND JOHN DOES 1)	
THROUGH 10,)	
)	
Defendants.)	

Defendant, Jeffrey N. Hansen, M.D., by and through his undersigned counsel, and pursuant to the Court's Amended Order on Initial Pretrial Conference hereby provides the following list of other witnesses:

1. Jeffrey Hansen, M.D., C/O Crowley Fleck PLLP, 500 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101, (406) 252-3441. Dr. Hansen has information regarding the care and treatment of Austin DuRose.
2. Nathaniel M. Rieb, M.D., C/O Crowley Fleck PLLP, 500 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101, (406) 252-3441. Dr. Reib has information regarding the surgical care and treatment of Austin DuRose.
3. Kevin J. Bruen, M.D., Saint Vincent Physician Network (SVPN) Heart and Vascular Center, Yellowstone Medical Center, 2900 12th Avenue North, Suite 400 East, Billings, Montana 59101 (406) 238-6820. Dr. Bruen has information regarding the care and treatment of Austin DuRose.
4. Steven J. Klepps, M.D., Ortho Montana, Yellowstone Medical Center, 2900 12th Avenue North, Suite 140 West, Billings, Montana 59101 (406) 237-5050. Dr. Klepps has information regarding the care and treatment of Austin DuRose.
5. Austin W. Durose, C/O Moyers Law P.C., 101 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101 (406) 655-4900. Austin DuRose has information and facts regarding the events that are the subject of this litigation including the care and treatment of his shoulder along the continuum of care, and his past, present and future health status.
6. Mindy E. DuRose, C/O Moyers Law P.C., 101 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101 (406) 655-4900. Mindy DuRose has information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose's shoulder along the continuum of care, and the past, present and future health status of Austin DuRose.

7. William K. DuRose, C/O Moyers Law P.C., 101 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101 (406) 655-4900. William DuRose has information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose's shoulder along the continuum of care, and the past, present and future health status of Austin DuRose.
8. Chase DuRose, C/O Moyers Law P.C., 101 Transwestern Plaza II, 490 North 31st Street, Billings, Montana 59101 (406) 655-4900. Chase DuRose has information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose's shoulder along the continuum of care, and the past, present and future health status of Austin DuRose.
9. Grandmother to Austin DuRose who resided with the DuRose family from 2006 until 2012 as per the deposition testimony provided by Mindy DuRose on July 2, 2014. This individual has information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose's shoulder along the continuum of care, and the past, present and future health status of Austin DuRose.
10. William Evans, M.D., Holy Apostles College and Seminary, 33 Prospect Hill Road, Cromwell, Connecticut 06416 (860) 632-3010. Dr. Evans has information and facts regarding the events that are the subject of this litigation as per his telephone interaction with Dr. Hansen on 09/20/2011.
11. Present and/or past employees of Powell Valley Healthcare, Inc. who provided care and treatment to Austin DuRose as identified in the medical records for Austin DuRose from Powell Valley Healthcare, Inc., 777 Avenue H, Powell, Wyoming 82435 (307) 754-2267. In addition to the persons previously identified by the

plaintiff these individuals include but are not limited to Michael Asay, Med Tech; Tami Asher, RN; Rachel Buchanan, RN; Andrew Baker, CRNA; C. Buren; Justin Gifford, PA-C; Glennda Harris, Medical Records Clerk; Teresa Hobbs, LPN; Bernie Knox, RN; Russ Lemasters, X-Ray Tech; Lisa Lucas, RN; Julie M.; James McEvoy, DO; Pat Ohara, OR Receptionist; Angela Redder, PA-C; Rebecca Rohrer, RT (X-ray Tech); Stuart Schwab, RT (X-ray Tech); Marilyn Sims, RN; Ashley Stagemeyer, Lab Tech; Brittany Steinmetz, Med Tech (lab); Breeann Widman (Med Tech); Vi Yates, RN; and Jeffrey Zuckerman, MD. These individual have information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose's shoulder along the continuum of care, and the past, present and future health status of Austin DuRose.

12. Present and/or past employees of Saint Vincent Healthcare who provided care and treatment to Austin DuRose as identified in the medical records for Austin DuRose from Saint Vincent Healthcare, 1233 North 30th Street, Billings, Montana, 59101 (406) 657-7000.
13. Present and/or past members of the medical staff of Saint Vincent Healthcare who provided care and treatment to Austin DuRose as identified in the medical records for Austin DuRose from Saint Vincent Healthcare, 1233 North 30th Street, Billings, Montana, 59101 (406) 657-7000.
14. Brad A. Gifford, West Medical, LLC, 4273 Chickadee Circle, Jackson, Wyoming 83001. Brad Gifford has information and facts regarding the intra-operative events that are the subject of this litigation and the ArthroCare Sports Medicine First Pass Suture Passer.

15. Casey Gifford, West Medical, LLC, 4273 Chickadee Circle, Jackson, Wyoming

83001. Casey Gifford has information and facts regarding the intra-operative events that are the subject of this litigation and the ArthroCare Sports Medicine First Pass Suture Passer.

16. Unknown employees of ArthroCare Corporation, 700 West William Cannon Drive,

Building One, Austin, Texas (512) 391-3900. These individuals have information and facts regarding the intra-operative events that are the subject of this litigation and/or the ArthroCare Sports Medicine First Pass Suture Passer.

17. Any and all healthcare providers who provided care and treatment to Austin DuRose

and whose records produced by plaintiff to defendant Hansen continue to be incomplete even though these missing records have been requested from the plaintiff repeatedly. These healthcare providers include but are not necessarily limited to the following: 3 Amigos Clinic and/or Dr. Hassler; Barrett Hospital and HealthCare; Barrett Hospital and HealthCare Clinic; Big Horn Basin Bone and Joint fka Big Horn Basin Orthopedic Clinic and/or Dr. Jimmie Biles; Dr. Lotshaw-Micken; Ortho Montana and/or Dr. Klepps; St. Vincent Healthcare; Saint Vincent Physician Network (SVPN) Heart and Vascular Center and/or Dr. Bruen; SVPN Regional Neuroscience Center fka Neurology Associates and/or Dr. Echeverri; West Park Hospital and/or Dr. Evans; Yellowstone Sports Medicine and/or Dr. Jimmy Biles. It is anticipated that these individuals will have information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose along the continuum of care, and his past, present and future health status.

18. Any and all healthcare providers who may have provided care and treatment to Austin DuRose and whose names and/or practice affiliation(s) appear in the medical and/or billing records of Austin DuRose and whose records we still do not have even though they have been requested from the plaintiff repeatedly. These healthcare providers include but are not necessarily limited to the following: Allscripts; AltaCare of Montana, Acadia of Montana, Bridger Orthopedic and/or Dr. Speth; Big Horn Basin Children's Clinic and/or Dr. Jamieson; Centeno-Schultz Clinic and/or Dr. Schultz and/or Dr. Hanson; CVS Caremark; Dillon Medical Walk-In Clinic; Dillon Medical Clinic; Dr. Stewart King; Intermountain Primary Children's Hospital; Saint Peter's Medical Group and/or Dr. Ford; Shriner's Hospital for Children – Salt Lake City; St. James Healthcare; Pediatric orthopedist in Billings; Stem Cell Research People in Denver, Colorado University of Medicine; and further orthopedic evaluation either in Helena or Seattle. It is anticipated that these individuals will have information and facts regarding the events that are the subject of this litigation including the care and treatment of Austin DuRose along the continuum of care, and his past, present and future health status.
19. Yet unidentified past and/or present healthcare providers whose names may be contained within the medical records for Austin DuRose that have not yet been provided to defendant by the plaintiff in response to defendant Jeffrey Hansen's numerous and repeated requests to the plaintiff to be provided with this information and these documents. It is anticipated that these individuals may have information and facts regarding the events that are the subject of this litigation including the care

and treatment of Austin DuRose along the continuum of care, and his past, present and future health status.

20. Any and all individuals identified in the academic and school records including protected health information for Austin DuRose from any and all teachers, administrative staff, school behavioral specialists, counselors (mental health and/or vocational, and/or school guidance), psychologists, and/or psychiatrists including but not limited to the following individuals: Brittany Wenke, Lisa Fitzgerald, Mary Dillivan, Ms. J. Evans, Jean A. Hubbard, and/or Channon Williams. Schools attended by Austin DuRose include but may not be limited to Heart of the Lakes/Dent Elementary Schools in the Perham Public School District; Franzee-Vergas Independent School District #23; Prairie Wind Middle School; Park County School District #1 and/or Powell Middle School; Dillon School District #10 and/or Dillon Middle School; and Beaverhead County High School District and/or Beaverhead County High School. It is anticipated that these individuals have information and facts regarding the events that are the subject of this litigation including the care and treatment of his shoulder along the continuum of care, and his past, present and future health status and academic and social progress and status.
21. All non-objectionable witnesses necessary for authentication, foundation, rebuttal and/or impeachment purposes.
22. All non-objectionable witnesses necessary to introduce exhibits.
23. All witnesses identified by any other party in this action.

Dated this 2nd day of December, 2014.

CROWLEY FLECK PLLP

By /s/ Christopher C. Voigt
Christopher C. Voigt
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Attorneys for Defendant
Jeffrey Hansen, M.D.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the following counsel of record, by the means designated below, this 2nd day of December, 2014:

<input type="checkbox"/> U.S. Mail	Jon M. Moyers
<input type="checkbox"/> FedEx	Moyers Law P.C.
<input type="checkbox"/> Hand-Delivery	Suite 101
<input type="checkbox"/> Facsimile	490 North 31 st Street
<input type="checkbox"/> Email	Billings, MT 59101
<input checked="" type="checkbox"/> ECF Electronic filing	

<input type="checkbox"/> U.S. Mail	Alfred F. Paoli, Jr.
<input type="checkbox"/> FedEx	Bogue Paoli & Thomas LLC
<input type="checkbox"/> Hand-Delivery	1401 17 th St., Suite 320
<input type="checkbox"/> Facsimile	Denver, CO 80202
<input type="checkbox"/> Email	
<input checked="" type="checkbox"/> ECF Electronic filing	

<input type="checkbox"/> U.S. Mail	Scott E. Ortiz
<input type="checkbox"/> FedEx	Brian J. Marvel
<input type="checkbox"/> Hand-Delivery	Williams, Porter, Day & Neville P.C.
<input type="checkbox"/> Facsimile	159 North Wolcott, Suite 400
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<input checked="" type="checkbox"/> ECF Electronic filing	Casper, WY 82602

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